

FILED

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

4:20CR00773 SEP/JMB

1. Defendant is charged with offenses for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act (Title 21, United States Code, Section 801, et seq.), or chapter 705 of Title 46 (Maritime Drug Law Enforcement), specifically possession with intent to distribute a controlled substance, namely, cocaine base (crack) and methamphetamine. Additionally, Defendant is also charged with possession of a firearm in furtherance of a drug trafficking crime.
2. Accordingly, a rebuttable presumption arises pursuant to Title 18, United States Code, Section 3142(e)(3) that there are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person

and the community.

3. According to St. Louis Metropolitan Police Department Complaint Number 20-047881, on October 21, 2020 at approximately 2:15 PM, officers observed a Kia Optima being driven by the Defendant. The officers recognized the Defendant from an on-going Assault 1st investigation which occurred on October 14, 2020 under CN 20-046772. The officers knew the Defendant was wanted for Assault 1st and Unlawful Possession of a Firearm. The officers followed the Defendant in the Kia Optima. Defendant pulled into the driveway of 8743 Annetta and quickly exited the vehicle. Defendant was taken into custody. The officers observed a bag of suspected narcotics on the driver's side floorboard. A further search of the vehicle revealed a loaded Kahr Arms make, 9mm caliber, semi-automatic pistol in the center console. The suspected narcotics were later confirmed to be approximately 18.13 grams of methamphetamine and .27 grams of cocaine base.

4. Defendant has a significant criminal history that includes the following felony convictions: Assault 1st degree (2 counts) and Armed Criminal Action (2 counts), Possession of a Controlled Substance-Cocaine Base (crack) and Resisting Arrest, and Possession of a Firearm in Furtherance of a Drug Trafficking Crime. Defendant was on federal supervised release in Cause Number 4:15 CR 255 HEA at the time of the offense.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

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/s/ John T. Bird
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